

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

In re:

CAPSTONE PEDIATRICS, PLLC,

Debtor.

)
) Chapter 7
)
) Case No. 3:19-bk-1971
)
)
)
)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that, pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rule 9010-1, the undersigned hereby appears in the above-captioned bankruptcy proceeding as counsel for Amerigroup of Tennessee, Inc. d/b/a Amerigroup Community Care (“Amerigroup”) and requests that all notices given or required to be given in these cases, including, but not limited to, all orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, and whether transmitted or conveyed by mail, electronic mail, ECF notice, hand delivery, telephone, telefax, telegraph, telex or otherwise, which affect the Debtors or these chapter 11 bankruptcy cases, be served upon:

Payton M. Bradford, Esq.
Frost Brown Todd LLC
150 Third Avenue South, Suite 1900
Nashville, Tennessee 37201
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PLEASE TAKE FURTHER NOTICE that the undersigned additionally requests that the Debtors, and their counsel, all court-appointed committees and their counsel, the United States Trustee, the Clerk of the Court, and all parties filing a notice of appearance herein, place

the foregoing party's name and address on any mailing matrix or list of creditors to be prepared or existing in the above-referenced bankruptcy case.

PLEASE TAKE FURTHER NOTICE that this entry of appearance is not intended to be, nor shall it constitute, a waiver of strict service in connection with Amerigroup's : (i) right to have final orders in non-core matters entered only after *de novo* review by a District Court judge; (ii) right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (iii) right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) any and all other rights of Amerigroup, all of which Amerigroup expressly reserves.

Dated: March 8, 2022

Respectfully Submitted:

/s/ Payton M. Bradford

Payton M. Bradford, Esq. (TN Bar #35053)

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*Counsel to Amerigroup of Tennessee, Inc. d/b/a
Amerigroup Community Care*

CERTIFICATE OF SERVICE

It is hereby certified that on March 8, 2022, a true and correct copy of the foregoing was served upon the parties consenting to electronic service via the court's Electronic Case Filing System ("ECF").

/s/ Payton M. Bradford

Payton M. Bradford

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